

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

EDWARD S. RASALAM,

Plaintiff,

v.

WAYFAIR, LLC; CEDARS BUSINESS
SERVICES, LLC, and EXPERIAN
INFORMATION SOLUTIONS, INC,

Defendant.

Case No. 4:21-cv-00763-SDJ-CAN

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

NOW COME Plaintiff Edward S. Rasalam (“Plaintiff”) and Defendants Wayfair, LLC and Cedars Business Services, LLC (“Defendants”) (collectively, the “Parties”), by and through their undersigned counsel, jointly requesting that the Court enter an Order extending the deadlines to complete Discovery, Dispositive Motions and Mediation deadline by 60 days, and in support thereof, stating as follows:

1. On December 17, 2021, the Court entered an order requiring the Parties to complete Discovery by June 21, 2022. [Dkt. 31]
2. On December 17, 2021, the Court entered an order requiring the Parties to complete Dispositive Motions by July 12, 2022. [Dkt. 31]
3. On December 17, 2021, the Court entered an order requiring the Parties to complete Mediation by July 19, 2022. [Dkt. 31]
4. The Parties were unable to complete Discovery due to scheduling conflicts of Plaintiff, Defendant and available Mediation dates.

5. The Parties have been working cooperatively together from the inception of this case and anticipate on completing Mediation on or before Monday, September 19, 2022

6. The Parties are respectfully requesting that the Court extend the Discovery deadline to August 22, 2022, extend dispositive motions to September 12, 2022, and extend deadline to mediate to September 19, 2022, to allow the Parties to complete Mediation and depositions.

7. The extended time for the previously mentioned Discovery deadlines will allow the parties to complete Mediations.

8. In light of the circumstances, there is good cause for the Court to grant the relief sought herein.

WHEREFORE, the Parties respectfully request that the Court enter an order extending the Discovery, Dispositive Motions, and Mediation deadline by 60 days, and for any further relief this Court deems just and proper.

Dated: June 9, 2022

EDWARD S. RASALAM

/s/ Marwan R. Daher

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WAYFAIR, LLC

CERTIFICATE OF CONFERENCE

Plaintiff's counsel certifies that he conferred with Defendant's counsel who indicated that Defendant does not oppose the instant motion.

CERTIFICATE OF SERVICE

I, Marwan R. Daher, certify that on June 9, 2022, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Marwan R. Daher